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Blockchain Funding, Inc., Blockchain Alliance LLC,
Masternode Partners, LLC, Lynne Martin,
Niya Holdings, LLC, Nima Momayez, and Jeremy Roma*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UTHERVERSE, INC., a Nevada corporation,
and BRIAN SHUSTER, an individual,

Plaintiffs,

v.

BRIAN QUINN, an individual; JOSHUA
DENNE, an individual; BLOCKCHAIN
FUNDING, INC., a Delaware corporation;
BLOCKCHAIN ALLIANCE LLC, a
Wyoming Limited Liability Company;
MASTERNODE PARTNERS, LLC, a
Wyoming Limited Liability company;
LYNNE MARTIN, an individual; NIYA
HOLDINGS, LLC, a Nevada limited liability
company; NIMA MOMAYEZ, an individual;
and JEREMY ROMA, an individual.

Defendants.

Case No.: 3:25-cv-00020-MMD-CSD

STIPULATION AND ORDER TO SET ASIDE DEFAULT [ECF 37] OF JEREMY ROMA

AND RELATED COUNTERCOMPLAINT.

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs Uthervese, Inc.
and Brian Shuster (“*Plaintiffs*”), through their counsel of record, Kearney Puzey Damonte Ltd. and
Coleman & Horowitz, LLP, and Defendant Jeremy Roma (“*Roma*”), through his counsel of record,
Brownstein Hyatt Farber Schreck, LLP, as follows:

1 1. On January 10, 2025, Plaintiffs filed their Complaint For Violation Of The
2 Racketeer Influenced And Corrupt Organizations Act (18 U.S.C. §§ 1961 Et Seq.); Fraud In The
3 Inducement; Intentional Misrepresentation (Fraud); Conversion; Breach Of Fiduciary Duty; Aiding
4 And Abetting Breach Of Fiduciary Duty; And Tortious Interference With Contract (“**Complaint**”).
5 [ECF 1].

6 2. On March 21, 2025, Plaintiffs filed a Request For Entry Of Default Against Jeremy
7 Roma (“**Request**”). [ECF 32].

8 3. On March 27, 2025, counsel for the parties conferred about several matters.
9 Pertinent here, Mr. Fetaz stated that initially there was a mistake concerning Roma’s representation,
10 but that his firm would be representing Roma. Mr. Fetaz further stated that his firm would soon be
11 filing a notice of appearance. Counsel then discussed how to address the pending Request. The
12 Parties scheduled a follow up call for April 2, 2025, to discuss this matter and other pending matters.

13 4. On April 1, 2025, the Clerk entered a Default against Jeremy Roma (“**Default**”).
14 [ECF 37].

15 5. Later that day, counsel for Roma filed a Notice of Appearance. [ECF 38].

16 6. On April 2, 2025, counsel for the parties again conferred concerning the Request
17 and now the Default. Roma’s counsel proposed to stipulate to set aside the default. Counsel for
18 Plaintiffs indicated that she would discuss the issue with her clients.

19 7. “Fed. R. Civ. P. 55(c) provides that the district court may set aside an entry of default
20 for good cause.” *O’Connor v. State of Nev.*, 27 F.3d 357, 364 (9th Cir. 1994), as amended (July 1,
21 1994), as amended (July 12, 1994).

22 8. Roma submits good cause exists to set aside the Default in light of the mistake
23 concerning his representation in this matter.

24 9. Further, Plaintiffs have not yet responded to Defendants’ Countercomplaint
25 pursuant to the Order granting Plaintiffs an extension. [ECF 36].

26 10. Accordingly, the parties stipulate and request that the Default [ECF 37] against
27 Roma be set aside pursuant to Rule 55(c).

28 11. This stipulation is brought in good faith by the parties and not for purposes of delay.

1 IT IS SO STIPULATED.

2 DATED this 10th day of April 2025.

3 BROWNSTEIN HYATT
4 FARBER SCHRECK, LLP

5 By: /s/ Maximilien D. Fetaz
6 MAXIMILIEN D. FETAZ, ESQ.
ZACHARY R. MEYER, ESQ.

7 *Attorneys for Defendants Brian Quinn, Joshua*
8 *Denne, Blockchain Funding, Inc., Blockchain*
9 *Alliance LLC, Masternode Partners, LLC,*
Lynne Martin, Niya Holdings, LLC, Nima
Momayez, and Jeremy Roma

DATED this 10th day of April 2025.

COLEMAN & HOROWITT, LLP

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Attorneys for Plaintiffs Utherverse, Inc. and
Brian Shuster

14 IT IS SO ORDERED.

16 UNITED STATES DISTRICT JUDGE

18 DATED: _____